

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

In re: Israel McKinney

Case No. 22-11558

Jennifer McKinney,
Debtors.

**STIPULATION BETWEEN DEBTORS AND MARINE CREDIT UNION
ON MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

Israel McKinney and Jennifer McKinney, the Debtors herein, and Marine Credit Union, by and through their respective counsel, stipulate and agree as follows:

WHEREAS, Marine Credit Union filed a motion for relief from the 11 U.S.C. §362(a) stay to pursue its lien rights in real property located at W5441 Innsbruck Road, West Salem, WI; and

WHEREAS, the Debtors filed an objection thereto; and

WHEREAS, the Parties wish to resolve their dispute on mutually agreeable terms;

NOW THEREFORE, the Parties stipulate and agree as follows:

1. The Debtors owe Marine Credit Union for post-petition payment due for January 5, 2023 in the amount of \$4,507.17.
2. The Debtors will repay this post-petition installment no later than January 30, 2023 by direct payment to Marine Credit Union, in addition to the regular ongoing monthly payments.
3. Each monthly payment on the post-petition arrearage must be made on or before the 5th day of each month beginning in February, 2023.
4. The above amounts may be prepaid at any time without penalty.
5. The Debtors shall make all regular monthly payments timely, including any applicable grace period, in the period February, 2023 through July, 2023.


6. In the event any such payment is not received in a timely manner, the Creditor may submit an affidavit of default and proposed order for relief from the automatic stay to the Court for signature.
7. Additionally, Marine Credit Union shall have the right to renew its *Motion for Relief of Stay* by letter in the event the Debtors fail to pay the post petition monthly installments due for August, 2023 through January, 2024.
8. The parties agree that this document may be executed in counterparts and that a facsimile signature shall constitute an original.



Attorney Greg P. Pittman, Counsel for the Debtors

2-2-2023

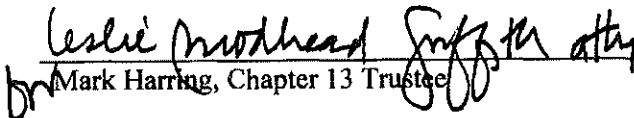
Dated



Sam Kaufman, Attorney for Marine Credit Union

2-2-2023

Dated



Mark Harring, Chapter 13 Trustee

1-26-2023

Dated